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Attorneys for Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

GEORGE THOMPSON, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

SONY ONLINE ENTERTAINMENT, LLC, a
Delaware Limited Liability Company, SONY
COMPUTER ENTERTAINMENT AMERICA
LLC, a Delaware Limited Liability Company;
SONY NETWORK ENTERTAINMENT
INTERNATIONAL LLC, a Delaware Limited
Liability Company; and SONY CORPORATION
OF AMERICA, a New York Corporation,

Defendants.

Case No. 4:11-cv-02340-DMR

**STIPULATION TO EXTEND
TIME FOR DEFENDANTS TO
MOVE, ANSWER, OR
OTHERWISE RESPOND TO
COMPLAINT, ORDER**

Judge: Donna M. Ryu

STIPULATION TO EXTEND TIME FOR DEFENDANTS TO
RESPOND TO COMPLAINT
CASE NO. 4:11-cv-02340-DMR

1 WHEREAS, defendants Sony Online Entertainment LLC (“SOE”), Sony Computer
2 Entertainment America LLC (“SCEA”) (f/k/a Sony Computer Entertainment America, Inc.),
3 Sony Network Entertainment International LLC (“SNEI”) and Sony Corporation of America
4 (“SCA”), as well as certain related entities (collectively, the “Sony Defendants”), have been
5 named as defendants in at least twenty-five (25) putative class action lawsuits within this District,
6 to date;

7 WHEREAS, certain of the Sony Defendants have also been named as defendants in at
8 least nineteen (19) putative class action lawsuits pending outside this District, to date;

9 WHEREAS, a motion is currently pending before the Judicial Panel on Multidistrict
10 Litigation (the “JPML”) to centralize this and other matters, to which one response has been filed
11 to date, and as to which other responses, including Sony Defendants’ response, are due by June 2,
12 2011.

13 WHEREAS, the current deadline for SOE, SCEA, SNEI and SCA to respond to the
14 Complaint is July 26, 2011;

15 WHEREAS, the parties have agreed to the extension of time herein for the defendants in
16 the above-captioned action to move, answer, or otherwise respond to the Complaint, in order to
17 facilitate the scheduling of this matter in coordination with the schedule for the motion before the
18 JPML;

19 NOW, THEREFORE, pursuant to Civil Local Rules 6-1(a), 7-1(a), and 7-12, all parties,
20 by and through their respective counsel, hereby stipulate as follows:

21 The deadline for the defendants to respond to the Complaint in the above-captioned action
22 is extended until and including 30 days after a consolidated complaint is filed in a multidistrict
23 litigation centralizing the above-captioned action with other matters, or if centralization is denied
24 by the JPML, then 30 days from the date of such order denying centralization.

25 ///

1 Either party may seek ex parte relief from this stipulated Order for good cause shown,
2 including, but not limited to, Defendants' filing of a responsive pleading in a related case.

3
4 Dated: May 31, 2011

VAHN ALEXANDER
FARUQI & FARUQI, LLP

5 By: /s/ Vahn Alexander /s/ [as authorized]
6 Vahn Alexander
7 Attorneys for Plaintiff
GEORGE THOMPSON

8 Dated: May 31, 2011

HARVEY WOLKOFF
THAD A. DAVIS
ROCKY C. TSAI
ROPES & GRAY LLP

9
10 By: /s/ Rocky C. Tsai /s/
11 Rocky C. Tsai

12 Attorneys for Defendants
13 SONY COMPUTER
14 ENTERTAINMENT AMERICA LLC
15 and SONY NETWORK
ENTERTAINMENT INTERNATIONAL
LLC.

16 **[PROPOSED] ORDER**

17 PURSUANT TO STIPULATION, IT IS SO ORDERED.

18
19 Dated: 6/2/11

20 By: 
21 U. S. District Court Magistrate Judge